

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FRANSSEN CONDOMINIUM  
ASSOCIATION OF APARTMENT  
OWNERS, a Washington non-profit  
corporation,

Plaintiff,

v.

COUNTRY MUTUAL INSURANCE  
COMPANY, an Illinois company;  
FARMINGTON CASUALTY COMPANY, a  
Connecticut company; THE TRAVELERS  
INDEMNITY COMPANY, a Connecticut  
company; THE TRAVELERS INDEMNITY  
COMPANY OF AMERICA, a Connecticut  
company; and TRAVELERS CASUALTY  
INSURANCE COMPANY OF AMERICA, a  
Connecticut company,

Defendants.

No.: 2:21-cv-00295-BJR

STIPULATED MOTION FOR  
CONTINUING PRETRIAL LITIGATION  
DEADLINES

Because of additional complications arising from the COVID-19 Pandemic, Plaintiff Franssen Condominium Association of Apartment Owners and Defendants Country Mutual Insurance Company, Farmington Casualty Company, The Travelers Indemnity Company, The Travelers Indemnity Company of America, and Travelers Casualty Insurance Company of America (collectively, the “Parties”) respectfully request a short extension of certain case deadlines.

1 The Parties previously encountered complications arising from the COVID-19 Pandemic.  
2 Accordingly, at the Parties' request, the Court granted a short continuance of certain pretrial  
3 deadlines.<sup>1</sup>

4 Since then, the parties have faced additional complications. A member of the law firm  
5 representing Plaintiff recently tested positive for COVID-19. Counsel for Plaintiff informed  
6 counsel for Defendants that this has interfered with Plaintiff's ability to timely respond to  
7 interrogatories and requests for production from the Travelers Defendants to Plaintiff. Given the  
8 circumstances, Plaintiff and the Travelers Defendants agreed to an extended deadline of January  
9 6, 2022, for Plaintiff's discovery responses, as well as for discovery responses from the Travelers  
10 Defendants to Plaintiff. That extended deadline, however, is after the current January 5, 2022,  
11 deadline for rebuttal expert disclosures.

12 In light of the circumstances, and to permit consideration of what is provided through the  
13 discovery responses for potential rebuttal expert disclosures, the Parties stipulate to the following  
14 proposed extension of the rebuttal expert disclosure deadline and related deadlines thereafter in  
15 the current case schedule<sup>2</sup>:

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25 <sup>1</sup> Dkt 34.

26 <sup>2</sup> Dkt 34.

	Current Deadline	New Deadline
Rebuttal expert disclosures	January 5, 2022	January 14, 2022
Expert deposition cutoff	February 4, 2022	February 10, 2022
Dispositive motion cutoff	February 11, 2022	February 18, 2022
Discovery completed by	February 25, 2022	February 25, 2022
All motions in limine must be filed by	May 16, 2022	May 16, 2022
Joint Pretrial Statement	May 23, 2022	May 23, 2022
Pretrial conference	June 6, 2022	June 6, 2022
Jury Trial Date	June 20, 2022	June 20, 2022
Length of Jury Trial	7-10 days	7-10 days

The Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of certain pretrial deadlines, set out above. The Parties do not believe that their requested changes will require rescheduling the trial.

It is so ordered.

DATED: January 5, 2022



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**CERTIFICATE OF SERVICE**

I hereby certify that January 5, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the persons listed below:

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